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## MEMO ENDORSED

July 7, 2023

#### Via ECF

The Honorable Edgardo Ramos, U.S.D.J. United States District Court Southern District of New York 40 Foley Square New York, NY 10007

Re:

Stewart et al v. Summit Health Management, LLC et al

Case No.: 1:23-cv-04073-ER

#### Dear Judge Ramos:

We are counsel to Plaintiffs in the above-referenced case. We write to request a two-week extension to amend the complaint in response to Defendants' June 16, 2023, letter requesting a premotion conference for an anticipated Motion to Dismiss under Fed. R. Civ. P. 12(b)(6). Plaintiffs' request will move the date for Plaintiffs to amend the complaint from July 7, 2023, to July 21, 2023. Defendants consent to this extension.

Plaintiffs seek the additional two weeks to fully address the issues raised in Defendants' letter, and to permit the Plaintiffs time to review and confirm the amended allegations found in the to-be-filed First Amended Complaint.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ C.K. Lee

C.K. Lee, Esq.

The request for an extension of time to amend the complaint (from July 7, 2023, to July 21, 2023) is GRANTED. SO ORDERED.

Edgardo Ramos, U.S.D.J. Dated: July 7, 2023 New York, New York